

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001 <i>This document relates to:</i> <i>Federal Insurance Co. v. al Qaida</i> , 03-cv- 6978 (RCC)	03 MDL 1570 (RCC) ECF Case
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DEFENDANT SANABEL AL-KHEER'S NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and all prior papers and proceedings herein, Defendant Sanabel Al-Kheer will move before the Honorable Richard Conway Casey, United States District Court for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, for the following relief:

- (a) dismissal of plaintiffs' Complaint pursuant to Fed. R. Civ. P. 12 (b)(6) for failure to state a claim upon which relief can be granted;
- (b) dismissal for any such further relief as the Court deems just and proper.

Dated: May 19, 2006

Respectfully Submitted,

/s/

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Attorney for Defendant Sanabel Al-Kheer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion to Dismiss was served via electronic case filing on this 19th day of May, 2006, upon the following:

Mr. Sean P. Carter, Esq.
Cozen O'Connor
1900 Market St.
Philadelphia, Pa. 19103-3508

_____/s/_____
Lisa D. Angelo, Esq.